

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND KENTUCKY AG'S  
STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE TO  
COMPLETE KENTUCKY RULE 30(b)(6)  
DEPOSITION**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, Kentucky Attorney General (“Kentucky AG”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current deadline for Meta to complete its Rule 30(b)(6) deposition of Plaintiff Commonwealth of Kentucky (“Kentucky”) is August 8, 2025. See ECF 2091.

2. Meta and the Kentucky AG have worked to schedule the Rule 30(b)(6) deposition of Kentucky, and have agreed to schedule the deposition for August 19 and 20, 2025 due to the availability of counsel and the designee witnesses.

3. In light of the agreed-upon dates for the Kentucky Rule 30(b)(6) deposition, the Parties have agreed to extend the existing August 8, 2025 deadline for Meta to complete its Rule 30(b)(6) deposition of Kentucky.

4. This Court has previously extended Meta’s deadline to complete fact and Rule 30(b)(6) depositions of State witnesses twice. See ECF 1696, 2091. This stipulated extension of the deadline for Meta to complete the Rule 30(b)(6) deposition of Kentucky does not and will not affect any other deadlines already set or that may be set in this action, nor the deposition time limits already set in ECF 1696, nor does it affect any party’s or non-party’s rights in relation to any other deadlines.

5. Therefore, the Parties agree that the following shall apply:

- a. Subject to the Court’s approval, Meta’s deadline to complete its Rule 30(b)(6) deposition of Kentucky shall be extended through and including August 22, 2025.
- b. The Kentucky AG reserves all rights related to the 30(b)(6) deposition of Kentucky. This agreement does not constitute a waiver of any objections the Kentucky AG has or may raise with respect to this deposition, nor does it alter any requirements or limitations imposed on this deposition by previous court orders, aside from the deadline for completion of such deposition.

1 c. Meta reserves all rights related to the 30(b)(6) deposition of Kentucky, including  
2 without limitation the right to dispute any objections that the Kentucky AG may  
3 raise.  
4

5 Respectfully submitted,

6 DATED: August 8, 2025

COVINGTON & BURLING LLP

7 By: /s/ Ashley M. Simonsen

8 Ashley M. Simonsen, SBN 275203

COVINGTON & BURLING LLP

9 1999 Avenue of the Stars

Los Angeles, CA 90067

10 Telephone: (424) 332-4800

11 Facsimile: + 1 (424) 332-4749

Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

12 *Attorneys for Meta Platforms, Instagram, LLC; Meta*  
13 *Payments, Inc.; and Meta Platforms Technologies, LLC*  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **RUSSELL COLEMAN**

2 Attorney General  
3 Commonwealth of Kentucky

4 /s/ Philip R. Heleringer

5 J. Christian Lewis (KY Bar No. 87109),

6 *pro hac vice*

7 Philip R. Heleringer (KY Bar No. 96748),

8 *pro hac vice*

9 Zachary Richards (KY Bar No. 99209),

10 *pro hac vice*

11 Daniel I. Keiser (KY Bar No. 100264),

12 *pro hac vice*

13 Assistant Attorneys General

14 1024 Capital Center Drive, Ste. 200

15 Frankfort, KY 40601

16 [Christian.Lewis@ky.gov](mailto:Christian.Lewis@ky.gov)

17 [Philip.Heleringer@ky.gov](mailto:Philip.Heleringer@ky.gov)

18 [Zach.Richards@ky.gov](mailto:Zach.Richards@ky.gov)

19 [Daniel.Keiser@ky.gov](mailto:Daniel.Keiser@ky.gov)

20 Phone: (502) 696-5300

21 Fax: (502) 564-2698

22 *Attorneys for Plaintiff the Commonwealth of*  
23 *Kentucky*

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 8, 2025

By: /s/ Ashley M. Simonsen

**[PROPOSED] ORDER**

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
Magistrate Judge Hon. Peter H. Kang